



Damon G. Tyner, Esq.
dtyner@tynerlawteam.com
Ph: 609.299.1250

April 25, 2024

SENT VIA E-MAIL bsykes@foxrothschild.com
Bridget Sykes, Esq.
FOX ROTHSCHILD
1301 Atlantic Ave.
Atlantic City, NJ 08401

Re: 1624 Pacific Ave. (Block 48.01, Lot 5)
Atlantic City, NJ

Dear Counsel:

Kindly be advised that I represent Farmers NJ, LLC, which is the contract purchaser of the neighboring property located at 1618-1622 Pacific Ave. (Block 48.01, Lots 3 & 4). It is my understanding that you represent the property owner located at the above referenced address.

As you may know, I have recently submitted an application for minor site plan approval to the Casino Reinvestment Development Authority (CRDA) for the development of a Class V adult use marijuana dispensary and the continuing non-conforming use of two apartments above the retail use on behalf of my client. In connection with the development process, it was discovered that my client has an ingress/egress easement across your client's property out to Dr. Martin Luther King Blvd., which is currently being violated by the placement of an HVAC unit within the easement. The easement, which has existed for many years, is critical to my client's proposed use because the fire safety code requires two ways of ingress egress for the residential tenants.

This is a formal request to cease and desist the impermissible interruption of the easement. I would ask that your client please make arrangements to re-locate the HVAC unit as soon as time permits and maintain the easement pursuant to our respective DEEDS.



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Thank you for your anticipated assistance with this matter.

If you have any questions, please do not hesitate to contact me. Thank you.

Sincerely,



DAMON G. TYNER

cc: Ron Stenger (via E-mail)
Kevin Dixon, P.E. (via E-mail)
Rob Reid, CRDA (via E-mail)